

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE



The matter addressed in this rejected order and accompanying motion is unresolved for the reason(s) set forth below.
IN RE:

CUMMINGS MANOOKIAN, PLLC,

Case No. 3:19-bk-07235

This order was filed in the main case and not the adversary proceeding, the court rejects the order as it needs to be filed in the adversary proceeding to be effective. Additionally, the top margin must be 4 inches please correct the margins and resubmit in the adversary proceeding as required.

JEANNE ANN BURTON, TRUSTEE,

Plaintiff,

v.

**HAGH LAW, PLLC; AFsoon HAGH;
MANOOKIAN, PLLC; and FIRST-
CITIZENS BANK & TRUST
COMPANY,
Defendants.**

Adv. Proc. No. 3:20-ap-90002

PROPOSED PRETRIAL DISCOVERY ORDER¹

This matter came before the Court on April 23, 2025, for a Pretrial Conference. Appearances were made at the Pretrial Conference by Phillip Young on behalf of the Trustee, Craig Gabbert on behalf of Afsoon Hagh and Hagh Law, PLLC, and John Spragens on behalf of Manookian, PLLC. At the Pretrial Conference, the Court directed the parties to confer concerning the completion of outstanding discovery. The Court having reviewed the parties' respective requests, it is hereby **ORDERED** that :

1. Discovery in this matter shall be completed by June 30, 2025.
2. All parties shall serve amended discovery responses or certify in writing that their prior discovery responses are accurate, full and complete by May 19, 2025.

¹ The parties are materially in agreement on the points below with the exception of the continuation of Jeannie Burton and Philip Young's depositions. Defendant understands the Trustee will file her own Proposed Order.

3. The deposition of Marty Fitzgerald shall occur via Zoom on June 12, 2025, pending the Trustee's issuance and service of a subpoena for testimony and production of documents for that day, or on such other date as the parties may agree.
4. The Trustee and Counsel for the Trustee shall be deposed on the topic of their amended discovery responses, which were served after their prior depositions, on a date or dates to be agreed upon by the parties no later than June 13, 2025.
5. The deadline for any party to file a discovery-related motion shall be June 20, 2025.
6. The Court shall conduct a subsequent pretrial conference on July 16, 2025, at 11:00 a.m., in Courtroom Two of the United States Bankruptcy Court for the Middle District of Tennessee.
7. Counsel for the parties shall confer on proposed pretrial and trial dates and shall file with the Court a pretrial worksheet outlining those proposed dates at least five (5) days prior to that pretrial conference,.

IT IS SO ORDERED.

This order was signed and entered electronically as indicated at the top of the first page.

APPROVED FOR ENTRY:

/s/ John Spragens

John T. Spragens

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Counsel to Manookian PLLC

REJECTED